# **CELLULARONE®**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, DC 20554



ODPY ORIGINAL

Re: Certification of CPNI Filing February 6, 2006 WC Docket No. 5, EB-06-TC-060

Ms. Dortch:

Enclosed herewith in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our compliance certificate and accompanying statement for the year ended December 31, 2005.

Sincerely,

Edward N. King, Chief Financial Officer

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FEB 7 2006
FCC - MAILROOM

### **CERTIFICATION**

I, Edward N. King, hereby certify this 6<sup>th</sup> day of February, 2006 that I am an officer of Cellular Properties, Inc. and that I have personal knowledge that Cellular Properties, Inc. has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2009.

Edward N. King

Chief Financial Officer

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#### **STATEMENT**

Cellular Properties, Inc. ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate
  use of CPNI. Carrier has established disciplinary procedures should an employee
  violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its sales and marketing campaigns that use its
  customers' CPNI. Carrier also maintains a record of any and all instances where
  CPNI was disclosed or provided to third parties, or where third parties were
  allowed access to CPNI. The record includes a description of each campaign, the
  specific CPNI that was used in the campaign, and what products and services
  were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI.

The FCC Acknowledges Receipt of Comments From ..

Cellular Properties, Inc.

...and Thank You for Your Comments

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Your Confirmation Number is: '200626948683'

Date Received:

Feb 6 2006

Docket:

05-196

Number of Files Transmitted: 3

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